1	REBECCA L. MASTRANGELO, ESQ. Nevada Bar No. 5417		
2	ROGERS, MASTRANGELO, CARVALHO & 1	MITCHELL	
_	700 S. Third Street		
3	Las Vegas, NV 89101		
	Telephone: (702) 383-3400		
4	Facsimile: (702) 384-1460 rmastrangelo@rmcmlaw.com		
5	mastrangero(@fmemaw.com		
3	Su-Lyn Combs (pro hac vice)		
6	TUCKER ELLIS LLP		
	515 South Flower Street		
7	Forty-Second Floor		
o	Los Angeles, CA 90071 Telephone: (213) 430-3400		
8	su-lyn.combs@tuckerellis.com		
9	<u>su tymoomos(w)tuekerems.com</u>		
	VASUDHSIRI SATHIENMARS (<i>PRO HAC VICE</i>)		
10	TUCKER ELLIS LLP		
11	201 Mission Street, Suite 2310		
11	San Francisco, CA 94105 Telephone: (415) 617-2400		
12	vasudhsiri.sathienmars@tuckerellis.com		
12			
13			
14	OTIS ELEVATOR COMPANY		
14	UNITED STATES DISTRICT COURT		
15	CIVILD SIMILS DISTRICT COOK!		
	DISTRICT OF NEVADA, SOUTHERN DIVISION		
16		G N 222 00054 IAB MBG	
17	SEBASTIAN SYMEONIDES, an Individual,	Case No. 2:23-cv-00854-JAD-MDC	
17	Plaintiff,	STIPULATION AND ORDER TO	
18	Tumini,	EXTEND OPPOSITION DEADLINES TO	
	VS.	PLAINTIFF'S MOTION FOR	
19		SANCTIONS DUE TO DEFENDANTS	
20	TRUMP RUFFIN COMMERCIAL, LLC, a	SPOILIATION OF EVIDENCE	
20	Foreign Limited-Liability Company d/b/a TRUMP INTERNATIONAL LAS VEGAS		
21	and TRUMP INTERNATIONAL HOTEL &		
	TOWER LAS VEGAS; TRUMP RUFFIN		
22	TOWER I, LLC, a Foreign Limited-Liability		
	Company; TRUMP INTERNATIONAL		
23	HOTELS MANAGEMENT, LLC, a Foreign Limited-Liability Company; OTIS		
24	ELEVATOR CORPORATION, a Foreign		
	Corporation; DOES I through X, inclusive;		
25	and ROE BUSINESS ENTITIES I through		
	XX, inclusive,		
26	I .		
- 1	Defendants		
27	Defendants.		
27	Defendants.		
2728	Defendants.		

Case No. 2:23-cv-00854-JAD-VCF

- 1			
1	IT IS HEREBY STIPULATED A	AND AGREED, by all parties, by and through their	
2	respective counsel of record, that the deadline for Defendants Otis Elevator Company and Trump		
3	Ruffin Tower I, LLC to file an opposition to Plaintiff's Motion for Sanctions Due to Defendants'		
4	Spoliation of Evidence (ECF No. 92), cur	rently due May 8, 2025, shall be extended to May 22,	
5	2025.		
6	Good cause exists for this request b	because the Motion for Sanctions involve complex legal	
7	and factual issues that are interrelated. The Motion for Sanctions contains hundreds of pages of		
8	extensive exhibits Properly addressing this Motion requires a thorough review of extensive records,		
9	expert reports, deposition testimony, and case law to ensure the Court receives well-reasoned and		
10	comprehensive arguments. Extending the deadlines will also allow Defendants to present consistent		
11	and cohesive arguments and ensuring that the Court has the full context to make an informed		
12	decision.		
13	This requested extension is made in good faith and not for purposes of delay.		
14	Respectfully submitted,		
15			
16	Dated this 2 nd day of May, 2025	Dated this 2 nd day of May, 2025	
17	CHRISTIANSEN TRIAL LAWYERS	LEWIS BRISBOIS BISGAARD & SMITH LLP	
18			
19	/s/ R. Todd Terry	/s/ David B. Avakian	
20	PETER CHRISTIANSEN, ESQ. Nevada Bar No. 5254	JOSH COLE AICKLEN, ESQ. Nevada Bar No. 7254	
21	R. TODD TERRY, ESQ.	DAVID B. AVAKIAN, ESQ.	
22	Nevada Bar No. 6519 KEELY P. CHIPPOLETTI, ESQ.	Nevada Bar No. 9502 YILMAZ E. TURKERI, ESQ.	
23	Nevada Bar No. 13931 710 South 7 th Street	Nevada Bar No. 15468 6385 S. Rainbow Blvd., Suite 600	
24	Las Vegas, NV 89101	Las Vegas, NV 89118	
25	Attorneys for Plaintiff	Attorneys for Defendant Trump Ruffin Tower I, Trump International	
26		Las Vegas and Trump International Hotel & Tower Las Vegas and Trump International	
27		Hotels Management, LLC	

28

dase 2:23-cv-00854-JAD-MDC Document 108 Filed 05/06/25

Page 3 of 4

ORDER

IT IS SO ORDERED that the opposition deadline of Defendant Otis Elevator Company and Trump Ruffin Tower I, LLC to Plaintiffs' Motion for Sanctions Due to Defendants' Spoliation of Evidence is hereby extended to May 22, 2025

> Hon. Maximiliano D. Couvillier VI United States Magistrate Judge

Dated: 5/6/2025

_

Case No. 2:23-cv-00854-JAD-VCF